

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

GREGORIO TREVIÑO, JR., et al

Plaintiffs,

v.

HIDALGO COUNTY, TEXAS, et al

Defendants

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Civil Case No. 7:15-cv-435

Plaintiffs' Proposed Voir Dire Questions

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs file this list of proposed voir dire questions in accordance with the pre-trial requirements of this Court:

1. Does anyone on the jury panel know either the Plaintiff or Defense Counsel?
2. Does anyone on the jury panel know any of the individual Defendants in this matter, AC Cuellar, Raul Lozano, David Rodriguez, Oscar Gonzalez, or Esteban Mata?
3. Does anyone on the jury panel currently, previously, or expect to work for, or otherwise have any business dealings with, Hidalgo County or any of the Defendants in this matter?
4. Is anyone on the jury panel related with anyone who is an employee of Hidalgo County?
5. Is anyone on the jury panel close friends with anyone who is an employee of Hidalgo County?
6. Does anyone on the panel work, currently or formerly, for a government agency?
7. Is anyone on the jury panel a business owner or otherwise supervisor over employees?
 - a. Have any of your employees or staff filed, or threatened to file, a lawsuit or other similar type of grievance against you or your company?
 - b. What was the type of claim and what was the outcome?
8. Has anyone on the jury panel been sued before?
 - a. What was the type of claim and what was the outcome?
9. Is anyone on the jury panel an attorney or work in an attorney's office that's practice area is predominately civil defense?

10. Is anyone on the jury panel related or close friends with someone who the previous question would apply to?
11. Is anyone on the panel aware of any personal biases he or she may hold that would make them prejudiced against the claims of the Plaintiffs in this matter?
12. Is anyone on the jury panel involved in politics in some way? Have you ever held an elected office? Are you related to or personally know anyone involved in politics, especially any office holders?
13. Would anyone on the jury panel be unable to give adequate weight to the testimony of a witness because the witness does not speak English and would require a translator?
14. Has anyone on the jury panel served on a jury involving a similar type of claim?
 - a. What was the case about and what was the outcome?
15. Does anyone on the jury panel generally believe that there are too many lawsuits or that damages awards are too high? Do you believe there should be caps on the amount of damages awarded?
16. Does anyone on the jury panel harbor a personal belief that a plaintiff should be unable to get damages against a government entity for a claim of discrimination?
17. Is there anyone on the jury panel who didn't raise their hand in response to a previous question, but now that you've heard more about the case, have thought more about it, realize that perhaps you should have answered yes to a previous question?